



**IT IS ORDERED as set forth below:**

**Date: May 29, 2025**

A handwritten signature in black ink, reading "Paul W. Bonapfel".

**Paul W. Bonapfel  
U.S. Bankruptcy Court Judge**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

IN RE:	:	CHAPTER 7
	:	
ANDREW RYAN EARWOOD,	:	CASE NO. 25-40242-PWB
	:	
	:	
DEBTOR.	:	

**ORDER AND NOTICE OF RULE 2004 EXAMINATION OF DEBTOR  
ANDREW RYAN EARWOOD AND  
FOR THE PRODUCTION OF DOCUMENTS**

The United States Trustee's Motion for Rule 2004 Examination of Andrew Ryan Earwood (the "Motion") [Dkt. No. 28] having been read and considered, is hereby

**ORDERED** that the Motion is granted and **NOTICE IS GIVEN** that the United States Trustee will conduct an examination of ANDREW RYAN EARWOOD by video call or in person at the Office of the United States Trustee on June 27, 2025, at 1:00pm,

or at such date, time, and place as the parties may agree. Dial in information will be circulated in advance of the examination.

**IT IS FURTHER ORDERED** that the examination may be rescheduled or adjourned from time to time and place to place by agreement of the parties or by announcement at the examination of the adjourned date, time, and place without further motion, order, or notice.

**IT IS FURTHER ORDERED** that if attendance and, if applicable, production of documents, cannot be obtained voluntarily, the United States Trustee may compel attendance and production of documents as provided in Federal Rule of Bankruptcy Procedure 2004(c).

[END OF DOCUMENT]

Order prepared by:

/s/  
Alan Hinderleider  
Georgia Bar No. 938543  
United States Department of Justice  
Office of the United States Trustee  
362 Richard B. Russell Building  
75 Ted Turner Drive, S.W.  
Atlanta, Georgia 30303  
(404)-331-4464  
Alan.Hinderleider@usdoj.gov

## **DISTRIBUTION LIST**

Andrew Ryan Earwood  
2 Bo Xing  
Temple, GA 30179

Thomas D. Richardson  
BrinsonAskewBerry, LLP  
615 West First Street, POB 5007  
Rome, GA 30162-5513

Alan Hinderleider  
United States Department of Justice  
Office of the United States Trustee  
362 Richard B. Russell Building  
75 Ted Turner Drive, SW  
Atlanta, Georgia 30303  
[Alan.Hinderleider@usdoj.gov](mailto:Alan.Hinderleider@usdoj.gov)

## EXHIBIT A

### REQUESTS FOR PRODUCTION OF DOCUMENTS

#### I. DEFINITIONS

1. “And” includes the word “or” and vice-versa, and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the document request all responses that might otherwise be construed to be outside the document request’s scope.

2. “All” includes the words “any” and “each” and vice-versa.

3. “Bankruptcy Case” shall mean *In re Earwood*, Case No. 25-40242-PWB (Bankr. N.D. Ga.).

4. “Debtor” shall mean Andrew Ryan Earwood, Chapter 7 debtor in bankruptcy case No. 25-40242-PWB pending in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division.

5. “Describe,” when used in connection with any act, occurrence, or physical facts, shall include but not be limited to the following: the identity of every person known to have been involved in or to have witnessed the act or occurrence; the date or dates of any such act or occurrence; and a description of any documents, records, or thing documenting or involved in the act, occurrence, or fact.

6. “Document” or “Documents” is used in the broadest sense possible, and includes, without limitation, any tangible thing upon which any expression, communication, information, data, or representation has been recorded by any means including, but not limited to written, printed, recorded, taped, filmed, videotaped or in computer, digital or magnetic memory or storage, however produced or reproduced, and also includes originals, drafts, and non- identical copies wherever located. “Document” or “Documents” shall include writings and recordings of every kind that are in Your actual or constructive possession, custody or control. The term “Document” further means any document now or at any time in your possession, custody, or control (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys).

7. “Person” shall include both the singular and plural and shall mean any natural person, firm, association, organization, partnership, joint venture, business, trust, trustee, corporation, or public or private entity, or other group or combination of the foregoing.

8. “You” or “Your” shall refer to Debtor.

9. The singular form of any word includes the plural and vice versa.

## **II. INSTRUCTIONS**

A. The following general instructions are an integral part of these requests and apply to each request set forth herein.

B. In producing Documents requested herein, You are instructed to search for and furnish all Documents within the direct or indirect, actual or constructive, possession, custody, or control of You, any agent, representative, employee, or attorney of or for You, or any Person who or entity which is or has been acting on Your behalf or under Your direct or indirect control.

C. You are instructed to produce Documents as they are kept or to produce Documents organized and labeled to correspond with the categories in this request.

D. If objection is made to any of the following requests, or if not all Documents responsive to a request are produced, state the specific grounds therefor and produce all Documents responsive to the request as to which there is no objection.

E. If a portion of an otherwise responsive Document contains information You contend is subject to a claim of privilege, those portions of the Document subject to the claim of privilege shall be redacted from the Document and the rest of the Document shall be produced.

F. These requests shall be deemed continuing so as to require further and supplemental production whenever You acquire, discover, or create additional responsive documents between the time of the initial production hereunder and the time that Debtors' bankruptcy case is dismissed, closed, or converted to a different chapter under the Bankruptcy Code.

## **III. DOCUMENTS AND INFORMATION REQUESTED**

1. A description of the income you received from all sources from January 1, 2023, through December 31, 2023;
2. A description of the income you received from all sources from January 1, 2024, through December 31, 2024;
3. A description of any funds that were deposited into any of your bank or credit union accounts that you contend are not income and an explanation for why they do not constitute income that should be listed on your Statement of Financial Affairs.
4. Documentation of the \$1,300 monthly alimony or child support expense Debtor listed on Schedule D;

5. Copies of your two most recent federal and state income tax returns with all schedules, statements, w-2s, 1099s, k-1s, etc.;
6. Complete copies of all monthly bank statements for all accounts you have an interest in or are a signatory on for the period of January 1, 2023, through March 31, 2025;
7. Complete copies of all monthly bank statements for all business accounts you have an interest in or are a signatory on for the period of January 1, 2023, through March 31, 2025, please include statements for the sole member LLC;
8. Venmo Statements for any Venmo account you used from January 1, 2023, through March 31, 2025;
9. Check images for all Check Deposits into your Family Savings CU Accounts (#2008, #8659, and #5576) from January 1, 2023, through March 31, 2025;
10. An explanation for all deposits you made into your Family Savings Credit Union Accounts #2008, #8659, and #5576) from January 1, 2023, through March 31, 2025;
11. An explanation of deposits from your ACH Bankcard ending in 8740 into your Family Savings Credit Union Accounts (#2008, #8659, and #5576) from January 1, 2023, through March 31, 2025.
12. Check images and a description of the recipient for any checks over \$200 written from each of your Family Savings CU Accounts (#2008, #8659, and #5576) from January 1, 2023, through March 31, 2025;
13. An explanation of all in-person cash withdrawal from any of your Family Savings Credit Union Accounts (#2008, #8659, and #5576) from January 1, 2023, through March 31, 2025.